

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA)	
)	
)	Case No. 21-265 (PKC)
v.)	
)	HON. PAMELA K. CHEN
)	
CONGYING ZHENG,)	MOTION FOR MODIFICATION OF
)	BOND AND CONDITIONS OF
)	RELEASE
Defendant.)	

The undersigned RENEE M. WONG, ESQ., affirms under penalty of perjury, that:

1. I represent defendant Congying Zheng in the above-captioned case.
2. At present, Mr. Zheng is subject to home confinement with a curfew from Pre-trial Services.
3. Mr. Zheng's aunt, Yuqiong Zheng, is hospitalized in Lenox Hill Hospital, 100 E 77th Street, New York, NY 10075.
4. Mr. Zheng requests permission to visit his aunt.
5. I have conferred regarding this request with AUSA Craig Heeren who has no objection to this request. Pre-trial Services, Joohn Kim also approved his request and permitted him to visit his aunt **today from 12 P.M. to 3 P.M.** He needs to be back to Brooklyn by 3PM today.

WHEREFORE, the Defendant respectfully moves this Court for an Order modifying the conditions of Mr. Zheng's pre-trial release so that he is able to visit his aunt at Lenox Hill Hospital today, June 22, 2023 from 12 P.M. to 3 P.M. and be back to Brooklyn by 3 P.M. today.

Respectfully submitted,

Dated: New York, New York
June 22, 2023

BY: /s/RENEE M. WONG
RENEE M. WONG, ESQ.